<u>Scaling Facility-specific Decisions to the Statewide Level to Determine if Updating General</u> <u>Variance Treatment Requirements is Warranted (Example: > 1 MGD Category)</u>

28 facilities (12 public, 16 private), 17 of which discharge at concentrations higher than WERF Level 3¹.

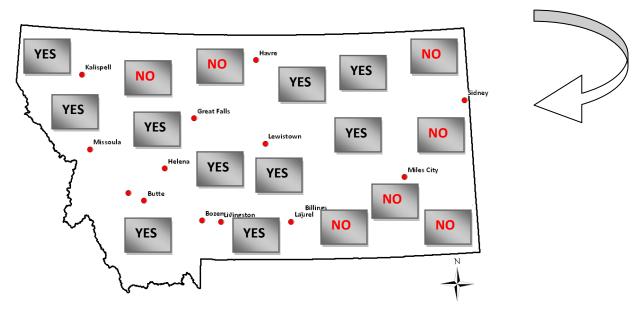
1. <u>Significant Nutrients Test</u> is applied to each facility. Would an upgrade to WERF level 3 for the facility lead to demonstrably improved water quality?



APPLY TEST TO THE FACILITY:
WILL UPGRADE LEAD TO
IMPROVED INSTREAM WATER
QUALITY?



2. Results for each facility <u>are considered together</u> at the <u>state scale</u> to make a decision for the category:



If <u>enough</u> facilities are **NO**, test stops. If enough are **YES**, move to Economic Impact Test. "Enough" needs to be established by DEQ and NWG (50% of facilities in category? 30%? Other?).

3. Economic Impact Test: Estimate the cost for a public facility to move from WERF level 2 to level 3, then calculate this cost as a % of MHI. Do this for all. If median % MHI for the group of public dischargers reviewed is > X % MHI, it is too expensive, no change to the General Variance treatment requirement is made. If it is < X % MHI, the category's treatment requirements update to WERF level 3 and these will be considered by Permitting at the next permit re-issuance. X % MHI needs to be defined.

¹ Only facilities discharging at concentrations <u>higher</u> than WERF level 3 (i.e., 5 mg TN/L and 0.2 mg TP/L) would be included because the General Variance for the >1 MGD category is currently at level 2 (10 mg TN/L and 1 mg TP/L).